

From: Khesha Jennings
To: Linc Wehrly
Cc: dickinson.david@epamail.epa.gov@EPA
Subject: Fw: BIN8-Diesel: scheduled EGR maintenance
Date: 04/04/2006 03:10 PM
Attachments: OM642_EGR-Hose.ppt
Noticeof60000interval10-12-05.wpd
ashcleaning frn.doc

Linc,

Here are two documents regarding the b7 process. The first is the FR Notice written for International's change in maintenance for their PM filters. The second is a general notice that Don K. wrote for all manufacturers in 2007. There were several versions of both documents. I attached the most recent ones that I had (not sure if they are final). Dave Dickinson has been leading this for us. He is out of the office on paternity leave, so if you have any questions give me a call.

Khesha Jennings, P.E.
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Compliance and Innovative Strategies Division
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Environmental Protection Agency
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Washington, DC 20460
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Noticeof60000interval10-12-05.wpd ashcleaning frn.doc

----- Forwarded by Khesha Jennings/DC/USEPA/US on 04/04/2006 02:36 PM -----

**Khesha
Jennings/DC/USEPA/US**

03/30/2006 07:45 PM

To Linc Wehrly/AA/USEPA/US
Byron Bunker/AA/USEPA/US@EPA, Gregory
Orehowsky/DC/USEPA/US@EPA, Han Lim/DC/USEPA/US@EPA,
cc Jason Gumbs/DC/USEPA/US@EPA, Martin
Reineman/AA/USEPA/US@EPA, William
Charmley/AA/USEPA/US@EPA

Subject Re: Fw: BIN8-Diesel: scheduled EGR maintenance

Sorry about the late response.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Khesha

▼ Linc Wehrly/AA/USEPA/US

Linc Wehrly/AA/USEPA/US

03/28/2006 08:32 AM

To Khesha Jennings/DC/USEPA/US@EPA, William
Charmley/AA/USEPA/US@EPA
Gregory Orehowsky/DC/USEPA/US@EPA, Jason
cc Gumbs/DC/USEPA/US@EPA, Han Lim/DC/USEPA/US@EPA,
Byron Bunker/AA/USEPA/US@EPA, Martin
Reineman/AA/USEPA/US@EPA

Subject Fw: BIN8-Diesel: scheduled EGR maintenance

DaimlerChrysler is requesting approval to include scheduled EGR maintenance for the 2007 MY Mercedes E320 diesel. The vehicle will certify to Tier 2 bin 8 emission standards. They want to clean the EGR hose at 40K, 80K, and 120K miles. They plan to provide this maintenance to their customers free of charge. Please read the message below.

As pointed out by DCX, their request complies with 86.1834-01(6)(ii) and 86.1834-01(6)(ii)(E).

Deliberative Process / Ex. 5

Thanks,
Linc

Linc Wehrly
USEPA
Compliance and Innovative Strategies Division
(734) 214-4286
wehrly.linc@epa.gov

----- Forwarded by Linc Wehrly/AA/USEPA/US on 03/28/2006 08:10 AM -----

**Martin
Reineman/AA/USEPA/US**
EPA-OAR,OTAQ,CISD
Sent by: Martin Reineman

To Linc Wehrly/AA/USEPA/US@EPA
cc Russell Banush/AA/USEPA/US@EPA
Subject Fw: BIN8-Diesel: scheduled EGR maintenance

Received Date:
03/27/2006 01:31 PM
Transmission Date:
03/27/2006 01:31:49 PM

----- Forwarded by Martin Reineman/AA/USEPA/US on 03/27/2006 01:22 PM -----

michael.e.hafner@daimlerchrysler.com
Sent by:
michael.e.hafner@daimlerchrysler.com

To Martin Reineman/AA/USEPA/US@EPA
cc eric.a.schneider@mbusa.com,
klaus.land@daimlerchrysler.com
Subject BIN8-Diesel: scheduled EGR maintenance

Received Date:
03/27/2006 12:52 PM
Transmission Date:
03/27/2006 12:52:33 PM

Hello Martin,

by this email we want to inform you about the inclusion of a scheduled EGR maintenance for our BIN8 Diesel and ask for your approval based on 40 CFR §86.1834 (6) (ii):

The maintenance is required for BIN8 technologies only where we need to run comparably high EGR flows in combination with short rich combustion conditions during NSC regeneration. Specifically, those rich intervals can lead - under very special circumstances such as very long exclusive city driving or the use of worst case Diesel fuel - to small deposits in the EGR hoses which then can impact the accuracy of EGR flow rates in the long run.

ED_002078J_00000341-00002

As we cannot foresee if those extreme conditions will be applicable to a specific vehicle in use it is our intention to apply a cleaning of the EGR hose as scheduled maintenance at 40,000/80,000/120,000 miles respectively. The attached figure shows where this hose is located:

(See attached file: OM642 EGR-Hose.ppt)

The current mileage of the durability run is 37,500 miles, thus it is our intention to perform the above mentioned cleaning of the hose in a few days at our certification durability vehicle. The maintenance will be free of charge for the customer within the useful life of the vehicle. Thus, a reasonable likelihood of the maintenance being performed in use is given in accordance to §86.1834 (6) (ii), (E).

Is it o.k. with EPA that we proceed as described or do you have any concerns? Please ask any questions you might have.

Thanks for your answer in advance, Michael

Mit freundlichen Grüßen / With best regards

Dr. Michael E. Hafner

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OM642 EGR-Hose.ppt